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DEPARTMENT OF JUSTICE

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REGISTRATION UNIT
CRIMINAL DIVISION

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

JUN 12 1977

For Six Month Period Ending _____
(Insert date)

Name of Registrant Frederick G. Dutton Registration No. 2591

Business Address of Registrant Suite 505, 1140 Connecticut Avenue, N.W.
Washington, D. C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(b) If an organization: N.A.

(1) Name	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

N.A.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes No

N.A.

If yes, furnish the following information:

Name	Position	Date Connection Ended
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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes No

N.A.

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes No

N.A.

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
Edmund N. Wise,	3636 Everett Street N.W., Wash. D. C.	Legal Associate	Sept. 1, 1976
Nancy H. Dutton,	4661 Hawthorne Ave. N.W., Wash. D. C.	Legal Associate	October 1, 1976
Nicholas H. Zumas,	3131 P St., N.W. Wash., D. C.	Legal Associate	Sept. 1, 1976

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name of foreign principal

Date of Termination

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes No

If yes, furnish following information:

Name and address of foreign principal

Date acquired

But Industrial Studies & Development Center of Saudi Arabia in last filing has been succeeded in interest by Saudi Basic Industries Corp., (new) Box 5101, Riyadh, Saudi Arabia. Same contract as previously filed applies; it has not been replaced or changed.

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Royal Embassy of Saudi Arabia, Washington, D. C.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Royal Embassy of Saudi Arabia

Counsel and advisor on U.S. laws and public processes; business, trade and financial matters; property, personnel and general operation; work with public relations and related personnel retained*

Saudi Basic Industries Corp.

Contract negotiations, drafting, tax aspects, and related matters; legal developments in relevant other countries affecting those; personnel.

* by Embassy, contracting for it with them, providing information if known, and part of overseeing them.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Royal Embassy of Saudi Arabia

Relations - those between the U.S. and Saudi Arabia.

Interests and Policies - Mutual trade and commerce between the two countries, achieving peace and stability in the Middle East; strengthening international prosperity and Five World strength as relations between the two countries contribute to those goals.

Counselling with officials, employees and contracting parties for foreign principal, who acted directly themselves. As part of counselling, have contracted for Embassy with several persons falling within the scope of this paragraph (as for Embassy with persons not within purview of par. 12), and in so contracting, have advanced initial amount required by agreement, as itemized in par. 15. Work with public relations and related personnel retained by Embassy, contracting for it with them, providing information if known, and part of overseeing them.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes No

If yes, describe fully.

(All a registrant does benefits one's clients, or in this case foreign principal, if one is at all consistent or integrated--or simply seeks to avoid conflicts of interest. To be responsive to the spirit of the Act, nothing new or additional has been undertaken in other activities not long undertaken and done for their own sake, not the principal - and not benefitting them in any substantial and tangible way.)

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
Jan. 18, 1977	Royal Embassy of Saudi Arabia	Compensation and Reimbursement	\$200,000.00
	Saudi Basic Industries Corp.	Same	23,595.91
	Royal Embassy of Saudi Arabia - Reimbursement for Funds advanced per request while handling contracting for Embassy		46,894.09
			Total <u>\$270,490.00</u>

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes No

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
	American Express - Air Fares on Different Airlines abroad and in U.S.		\$ 19,885.00
	Swissair	Direct Payment	1,113.00
	Intercontinental	Riyadh Hotel	1,850.00
	St. Francis Hotel,	San Francisco	1,503.69
	American Express	- for different hotels	5,000.17
	Avis	Car Rental	1,630.19
	American Express	- for other car rentals	121.80
	Saudi Review		748.00
	Books - small purchases	from a number of stores	795.00
	American Express	- for a number of eating places abroad and in U.S.	1,760.00
	Ed Wise	- legal	21,190.00
	Nancy Hogan Dutton	- legal	35,000.00
	Nancy Hogan Dutton	- reimbursed costs	3,500.00
	Nick Zumas	- overhead, allocated	5,000.00
	Robert Pierce	- advance, reimbursed	10,000.00
	Michael Moynihan	- advance, "	7,500.00
	Legal office personnel	- allocated	5,000.00
	Nell Morgan		1,400.00
	Nancy Hargess		1,000.00
	Suzanne White		364.58
	Sophie Naldo		485.50
	Jan Fisler		1,000.00
	Christopher Dutton		5,250.00
	Fred Maroon	- advance	3,650.00
	W. & J. Sloans		2,400.00
	IBM		682.00
	Woodward & Lothrop		650.00
	Office expense - not included above	- small individual payments, allocated	2,800.00
	Balance on hand for incurred costs to Metro Fuel Co.	for Embassy's heating system ^{advance} _{reimburse}	5,600.00

\$154,878.93

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes No

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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N.A.

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes No

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Royal Embassy of Saudi Arabia

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: **Assisted at times in ***
 Radio or TV broadcasts Magazine or newspaper Motion picture films Letters or telegrams articles
 Advertising campaigns Press releases Pamphlets or other publications Lectures or speeches
All of the above were done primarily by others; but registrant did provide some counselling.
 Other (specify) -----

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: **N.A.**
 Public Officials Newspapers Libraries
 Legislators Editors Educational institutions
 Government agencies Civic groups or associations Nationality groups
 Other (Specify) -----

21. What language was used in this political propaganda:
 English Other (specify) -----

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? **N.A.**
Yes No

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes No **N.A.**

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?
Yes No **N.A.**

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following: **N.A.**

Exhibit A⁶ Yes No

Exhibit B⁷ Yes No

If no, please attach the required exhibit.

(a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment. **Attached simply shows Saudi Basic Industries Corp. as successor to Industrial Studies & Development Center of Saudi Arabia.**

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

* part of drafting and editing of indicated material for Embassy which did principal preparation or entirely disseminated or caused it to be disseminated.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6-month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes No

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)



Frederick G. Dutton

Subscribed and sworn to before me at Washington, DC

this 11th day of July, 19 77



(Signature of notary or other officer)
My Commission Expires July 14, 1981

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes X or No

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes or No

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Frederick G. Dutton

Signature

July 11, 1977

Date

Frederick G. Dutton

Please type or print name of signatory on the line above

Registrar 2591

Title